

1 Richard A. Wright, Esquire
2 WRIGHT STANISH & WINCKLER
3 300 S. Fourth Street
4 Suite 701
5 Las Vegas, NV 89101
6 Telephone: (702) 382-4004

7 Richard B. Herman, Esquire
8 Richard B. Herman, P.C.
9 445 Park Avenue
10 9th Floor
11 New York, New York 10022
12 Telephone: (212) 759-6300

13 Attorneys for Defendant RAMON DESAGE

14 UNITED STATES DISTRICT COURT

15 DISTRICT OF NEVADA

16 UNITED STATES OF AMERICA,) Case No.: 2:13-cr-00039-JAD-VCF
17 Plaintiff,)
18 vs.)
19 RAMON DESAGE,)
20 Defendant.)

21 **AMENDED UNOPPOSED MOTION TO**
22 **TRAVEL AND PROPOSED ORDER**

23 Comes now, Defendant Ramon Desage, by and through his counsel, Richard A. Wright,
24 Esquire and Richard B. Herman, Esquire, and hereby moves this Court for permission to amend
25 travel dates from Las Vegas, Nevada to New York City to August 16, 2015 and returning on August
18, 2015. While in New York City, Mr. Desage will be meeting with attorneys and he will be
staying at the St. Regis Hotel, 2 East 55th Street, New York, New York. The Court on August 11,
2015 approved Mr. Desage's initial travel motion; unfortunately, Mr. Desage's meeting in New York
was cancelled and we are trying to reschedule with the Court's approval.

26 On August 10, 2015, Richard B. Herman, Counsel for Mr. Desage, personally discussed Mr.
27 Desage's initial travel request with Pre-Trial Services Officer Zack Bowen, who advises he consents
28 to this travel request. Mr. Herman provided Officer Bowen with Mr. Desage's travel itinerary and

1 hotel information. Mr. Desage will continue with electronic monitoring and will abide by all other
2 bail conditions. Upon his return to Las Vegas on August 18, 2015, Mr. Desage will give a courtesy
3 call to Officer Bowen.

4 Counsel for Mr. Desage has discussed the initial request with Assistant United States
5 Attorney Gregory Damm, who has no opposition to it.

6 DATED this 12th day of August 2015.

7 Respectfully submitted:

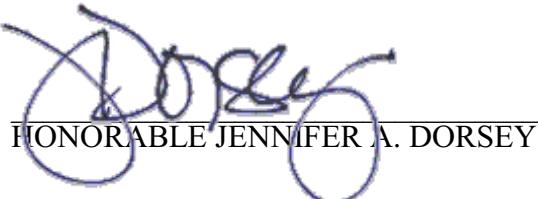
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9 BY _____ /s/ Richard A. Wright
10 RICHARD A. WRIGHT, ESQUIRE
11 300 S. Fourth Street
12 Suite 701
13 Las Vegas, NV 89101
14 Telephone: (702) 382-4004
15 Attorney for Defendant, Ramon Desage

16 BY _____ /s/ Richard B. Herman
17 RICHARD B. HERMAN, ESQUIRE
18 New York Bar No. 1898758
19 445 Park Avenue
20 9th Floor
21 New York, NY 10022
22 Telephone: (212) 759-6300
23 Attorney for Defendant, Ramon Desage

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ORDER

28 This matter having come before the Court on the amended unopposed motion of Defendant
1 Ramon Desage, and good cause appearing, Defendant's Motion for Permission to Travel to New
2 York City on August 16, 2015 and returning August 18, 2015 is **GRANTED**.

3 HONORABLE JENNIFER A. DORSEY
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5 DATED: August 12, 2015.
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28 Respectfully submitted by:



HONORABLE JENNIFER A. DORSEY

1 WRIGHT STANISH & WINCKLER

2 /s/ Richard A. Wright

3 RICHARD A. WRIGHT

4 RICHARD B. HERMAN, P.C.

5 /s/ Richard B. Herman

6 RICHARD B. HERMAN

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